

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

JESSICA JONES, et al.,

Plaintiffs,

v.

VARSITY BRANDS, LLC, et al.

Defendants.

Case No. 2:20-cv-02892-SHL-tmp

JURY DEMAND

**PLAINTIFFS' MOTION TO COMPEL RESPONSES TO INTERROGATORIES BY
VARSITY DEFENDANTS**

Plaintiffs Jessica Jones and Christina Lorenzen (collectively, “Plaintiffs”), individually and on behalf of all others similarly situated, move this Court, pursuant to Fed. R. Civ. P. 37 and Local Rule 26.1(b), for an order compelling Defendants Varsity Brands, LLC, Varsity Spirit, LLC, and Varsity Spirit Fashion & Supplies, LLC (collectively, “Varsity”) to respond fully to the requests for discovery set forth below. Varsity has objected and refused to comply with the following discovery requests, the responses to which are set forth verbatim, in accordance with Local Rule 26.1(b)(2):

Interrogatory No. 1:

State each affirmative defense to the claims against You.

Objection and Response to Interrogatory No. 1:

Varsity objects to Interrogatory 1 as seeking information that Varsity is not required to provide prior to filing an answer in this case. Subject to and without waiving the foregoing objections, Varsity will identify any affirmative defenses when and to the extent an answer is required under the Federal Rules of Civil Procedure. Without limitation on its right to assert affirmative defenses at the time of its answer in this case, Varsity further notes that the defenses set forth in its Answer to the Complaint in *Fusion Elite All Stars, et al. v. Varsity Brands, LLC, et al.* are equally applicable to the claims in this case.

Interrogatory No. 2:

State each fact which you contend supports each affirmative defense You stated in response to Interrogatory No. 1.

Objection and Response to Interrogatory No. 2:

Varsity objects to Interrogatory 2 as seeking information that Varsity is not required to provide prior to filing an answer in this case, and as seeking attorney work product.

Subject to and without waiving the foregoing objections, Varsity will identify the facts supporting its affirmative defenses when and to the extent it is required to do so under the Federal Rules of Civil Procedure. Without limitation on its right to assert affirmative defenses at the time of its answer in this case, Varsity further notes that the defenses set forth in its Answer to the Complaint in *Fusion Elite All Stars, et al. v. Varsity Brands, LLC, et al.* are equally applicable to the claims in this case.

Dated: April 12, 2022

Respectfully submitted,

By: /s/ Joseph R. Saveri
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CERTIFICATE OF SERVICE

I hereby certify that on April 12, 2022, I served a copy of the foregoing document via the Court's ECF system, effecting service on all interested parties.

/s/ Joseph R. Saveri
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